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REMARKS

Claims 1-19 remain in the application including independent claims 1 and 11. Claim 2 has been amended to overcome the examiner's objection.

The examiner is asserting that the declaration is defective because it does not clearly identify the mailing address of each inventor. Specifically, the examiner argues that some inventor's mailing addresses only include a zip code but lack city and state information. Applicant disagrees. The mailing address for each of the inventors is complete and can be found in the declaration. The mailing addresses are as follows:

- (1) Bruce D. Beneditz, 5548 Rural Edge Drive, Roscoe, Illinois 61073;
- (2) Russell G. Stoneback, 1157 Griggs Road, Rockford, Illinois 61108;
- (3) Kenneth Spear, Elektrastr. 46, Munich, Germany 81925;
- (4) Marc A. Bouton, 5906 Covey Ridge Tr., Loves Park, Illinois 61111; and
- (5) John A. Dickey, 5624 E. Hillery Drive, Scottsdale, Arizona 85254.

Please note that Kenneth Spear has a German mailing address and thus, there is no "state" to identify. The German mailing address is complete as shown. Also, please note that for two of the listed inventors (Bruce Beneditz and Russell Stoneback), the city and state information was not repeated after the mailing addresses. However, all required information is located on the "Residence" line. Thus, Applicant asserts that the declaration is not defective and that a supplemental declaration is not required.

Claims 1, 6, and 11 stand rejected under 35 U.S.C. 102(e) as being anticipated by Heckmann et al. (US6525432). Applicant submits herewith a declaration pursuant to 37 CFR §1.131 evidencing that the claimed invention was conceived prior to April 3, 2000, which is the

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effective 102(e) date for Heckmann. Accordingly, the Heckmann reference does not qualify as prior art. The rejections under 35 U.S.C. §102(e) and §103, which depend upon Heckman should be withdrawn.

Further, Heckmann does not disclose the features of claim 1. Claim 1 requires a first microprocessor having a first serial bus in communication with each of the power modules and a second microprocessor having a second serial bus in communication with each of the power modules independent from the first serial bus. Heckmann does not teach the use of first and second microprocessors having first and second serial buses that are in communication with each of the power modules.

Heckmann discloses a central unit 10 that has at least two microcomputers (FIGURE 2). The microcomputers communicate with control units 26, 28, 30, and 32 through a common communications system 24. A processing unit 58 determines braking set point values and transmits these values to the control units 26, 28, 30, 32 through the communications system 24. Each control unit 26, 28, 30, 32 also has its own microcomputer. Connected to the communication system are units 106, 108, 110, 112 (FIGURE 1) that are all provided with a microcomputer. The latter is not shown but is indicated (see 114, 116, 118, 12). See column 4, lines 24-30.

The figures do not show and Heckmann does not disclose one microprocessor having a first serial bus in communication with each of the power modules and a second microprocessor having a second serial bus in communication with each of the power modules. The examiner argues that this is disclosed at col. 2, line 13; col. 3, line 6; and col. 3, line 50 of Heckmann, but does not identify what specific components in Heckmann correspond to Applicant's claimed elements. Further, the cited portions of Heckmann do not provide any additional explanation of how Heckmann provides

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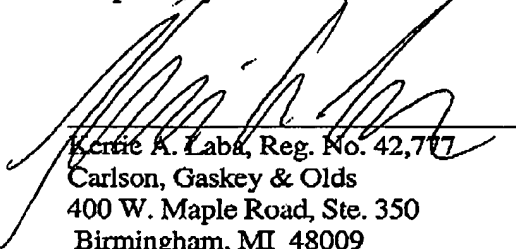
or teaches these claimed elements. Thus, Heckmann does not anticipate claim 1. For similar reasons, Heckmann also does not anticipate claim 11.

Claims 2-4 and 12-15 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Heckman and Canter. Claims 6 and 16 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Heckman and Simonelli. Claims 7-9 and 17-18 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Heckman and Bernier. Claim 10 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Heckman and Boran and further in view of Cypress Semiconductor. Claim 19 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Heckman and Morgan.

For the reasons set forth above, Heckmann does not qualify as prior art. Further, Heckmann does not disclose, suggest, or teach the claimed features set forth in independent claims 1 and 11. The modifying references recited in the multiple 103 rejections do not make up for the deficiencies of Heckmann.

Thus, Applicant believes that all claims are now in condition for allowance. An indication of such is respectfully requested. Applicant believes that no additional fees are required, however, the Commissioner is authorized to charge Deposit Account No. 50-1482 in the name of Carlson, Gaskey & Olds for any additional fees or credit the account for any overpayment.

Respectfully submitted,



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CERTIFICATE OF TRANSMISSION UNDER 37 CFR 1.8

I hereby certify that this correspondence is being facsimile transmitted to the United States patent and Trademark Office, fax number (703) 872-9306, on July 23, 2004.


Laura Combs

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